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Attorneys for GRAY MEDIA GROUP INC.,
D/B/A KGMB/KHNL and LYNN KAWANO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RONDA SMYTHE; LIANA P.)	CASE NO. CV 21-00056 LEK-RT
KANNO,)	(Consolidated Case for Purposes of
)	Pretrial Proceedings and Discovery)
Plaintiffs,)	
vs.)	NON-PARTY GRAY MEDIA GROUP
)	INC., D/B/A KGMB/KHNL AND LYNN
BRANDON SAFFEELS;)	KAWANO'S MOTION FOR
COUNTY OF MAUI; JOHN DOES)	PROTECTIVE ORDER AND/OR TO
1-10; JANE DOES 1-10; DOE)	QUASH SUBPOENA;
PARTNERSHIPS 1-10; DOE)	MEMORANDUM IN SUPPORT OF
CORPORATIONS 1-10; AND)	MOTION; DECLARATION OF DAVID
DOE ENTITIES 1-10,)	R. MAJOR; EXHIBITS A-H;
)	CERTIFICATE OF SERVICE
Defendants.)	
_____)	(Caption continued on next page.)

ALISHA N.K. CONSTANTINO,)	Trial Date: March 6, 2023
)	
Plaintiff,)	
)	
vs.)	
)	
BRANDON SAFFEELS;)	
COUNTY OF MAUI; JOHN DOES)	
1-10; JANE DOES 1-10; DOE)	
PARTNERSHIPS 1-10; DOE)	
CORPORATIONS 1-10; AND)	
DOE ENTITIES 1-10,)	
)	
Defendants.)	
_____)	

NON-PARTY GRAY MEDIA GROUP INC.,
D/B/A KGMB/KHNL AND LYNN KAWANO’S MOTION
FOR PROTECTIVE ORDER AND/OR TO QUASH SUBPOENA

Non-Party GRAY MEDIA GROUP INC., D/B/A KGMB/KHNL, owner and operator of Hawaii News Now, and its reporter LYNN KAWANO (together, “HNN”), by and through their counsel, Lung Rose Voss & Wagnild, for a protective order to prevent the County of Maui from taking the deposition of Ms. Kawano and/or to quash Defendant County of Maui’s First Amended Notice of Taking Deposition Upon Oral Examination of Lynn Kawano and Production of Documents, served November 10, 2022.

HNN brings this motion pursuant to Rule 45 of the Federal Rule of Civil Procedure and the reporter's privilege as provided for in the United States Constitution.

DATED: Honolulu, Hawaii, November 26, 2022.

/s/ David R. Major

BRUCE D. VOSS

DAVID R. MAJOR

Attorney for GRAY MEDIA GROUP INC.,
D/B/A KGMB/KHNL and LYNN
KAWANO